

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYMBOLGY INNOVATIONS, LLC

Plaintiff,

VS.

CITIBANK NA

Defendant.

SYMBOLGY INNOVATIONS, LLC

Plaintiff,

VS.

HSBC BANK USA, NATIONAL
ASSOCIATION

Defendant.

Case No: 2:16-cv-00450-RWS

LEAD CASE

Case No: 2:16-cv-00447-RWS

CONSOLIDATED CASE

UNOPPOSED MOTION TO DISMISS HSBC BANK USA, NATIONAL ASSOCIATION
WITH PREJUDICE

Under Federal Rule of Civil Procedure 41(a) Symbology Innovations, LLC moves the Court to dismiss all claims by Symbology Innovations, LLC against Defendant HSBC Bank USA, National Association with prejudice, and with each party to bear its own attorneys' fees and costs.

Dated: December 15, 2016

Respectfully submitted,

/s/ Jay Johnson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

The undersigned counsel for Plaintiff certifies that he met and conferred with counsel for Defendant on December 15, 2016 and that Defendant's counsel agrees with this motion.

/s/ Jay Johnson

Jay Johnson

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 15, 2016.

/s/ Jay Johnson

Jay Johnson